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8 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

Case No. 2:21-mj-00505-DJA

10 Plaintiff,

~~Stipulation for an Order~~
**Directing Probation to Prepare
a Criminal History Report**

11 v.

12 MARTIN ROMERO-GALLEGOS,

13 Defendant.
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16 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
17 Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States
18 Attorney, counsel for the United States of America, and Wendi L. Overmyer, Assistant
19 Federal Public Defender, counsel for Defendant MARTIN ROMERO-GALLEGOS, that
20 the Court direct the U.S. Probation Office to prepare a report detailing the defendant's
21 criminal history.

22 This stipulation is entered into for the following reasons:

23 1. The United States Attorney's Office has developed an early disposition
24 program for immigration cases, authorized by the Attorney General pursuant to the

1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.

8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 18th day of June, 2021.

15 Respectfully submitted,

16 CHRISTOPHER CHIOU
17 Acting United States Attorney

18 /s/ Wendi L. Overmyer
19 WENDI L. OVERMYER
20 Assistant Federal Public Defender
Counsel for Defendant MARTIN
ROMERO-GALLEGOS

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARTIN ROMERO-GALLEGOS,

7 Defendant.
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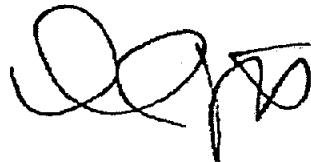
Case No. 2:21-mj-00505-DJA

**Order Directing Probation to Prepare
a Criminal History Report
[Proposed]**

10 Based on the stipulation of counsel, good cause appearing, and the best interest of
11 justice being served:

12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
13 report detailing the defendant's criminal history.

14 DATED this 21st day of June, 2021.



16 HONORABLE DANIEL J. ALBREGTS
17 UNITED STATES MAGISTRATE JUDGE
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